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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY

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10 Attorneys for Plaintiff,
11 Sandra Huelsman

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 WESTERN DIVISION

17 Sandra Huelsman,

18 Case No.: SACV13-1922-JVS (DFM)

19 Plaintiff,

20 vs.

21 Worldwide Recoveries, LLC; Platinum
22 Recovery, LLC; Premium Asset Services,
23 LLC a/k/a PAS Services; Premium
24 Receivables, LLC; and DOES 1-10,
inclusive,

25 **COMPLAINT FOR DAMAGES**
26 **1. VIOLATION OF FAIR DEBT
COLLECTION PRACTICES ACT,
15 U.S.C. § 1692 ET. SEQ;**
27 **2. VIOLATION OF FAIR DEBT
COLLECTION PRACTICES ACT,
CAL.CIV.CODE § 1788 ET. SEQ.**
28 **3. VIOLATIONS OF THE
TELEPHONE CONSUMER
PROTECTION ACT –
47 U.S.C. § 227, ET SEQ.**

Defendants.

JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES

1 For this Complaint, the Plaintiff, Sandra Huelsman, by undersigned counsel,
2 states as follows:
3

4 **JURISDICTION**

5 1. This action arises out of Defendants' repeated violations of the Fair Debt
6 Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"), violations of the
7 Telephone Consumer Protection Act, 47 U.S.C. § 227, *et. seq.* ("TCPA"), and the
8 invasions of Plaintiff's personal privacy by the Defendants and its agents in their
9 illegal efforts to collect a consumer debt.

10 2. Supplemental jurisdiction exists pursuant to 28 U.S.C. § 1337.

11 3. Venue is proper in this District pursuant to 28 U.S.C. § 1331(b), in that
12 Defendants transact business here and a substantial portion of the acts giving rise to
13 this action occurred here.

14 **PARTIES**

15 4. The Plaintiff, Sandra Huelsman (hereafter "Plaintiff"), is an adult
16 individual residing in Los Angeles, California, and is a "consumer" as the term is
17 defined by 15 U.S.C. § 1692a(3) and is a "person" as defined by 47 U.S.C. § 153(10).

18 5. Defendants, Worldwide Recoveries, LLC, Platinum Recovery, LLC,
19 Premium Asset Services, LLC a/k/a PAS Services, and Premium Receivables, LLC
20 (collectively "Defendants"), are each business entities that engage in collection
21 activity within the state of California and the County of Los Angeles. Each Defendant
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1 is a “debt collector” as the term is defined by 15 U.S.C. § 1692a(6), and is a “person”
2 as defined by 47 U.S.C. § 153(10).

4 6. The Defendants are intricately bound together and combine their efforts
5 in attempts to collect debts allegedly owed by consumers. Although each Defendant is
6 registered as an independent entity, Defendants share the same phone numbers, same
7 offices, and the same principals. As more fully set forth below, Defendants operate
8 together in such a way that it is impossible to distinguish entity one from the other,
9 and as such they are jointly and severally liable for the acts of their counterparts.
10

12 7. Does 1-10 (the “Collectors”) are individual collectors employed by
13 Defendants and whose identities are currently unknown to the Plaintiff. One or more
14 of the Collectors may be joined as parties once their identities are disclosed through
15 discovery.
16

17 8. Defendants at all times referenced herein acted together and/or by and
18 through one or more of the Collectors.
19

ALLEGATIONS APPLICABLE TO ALL COUNTS

A. The Debt

23 9. The Plaintiff allegedly incurred a financial obligation (the “Debt”) to a
24 creditor (the “Creditor”).

1 10. The Debt arose from services provided by the Creditor which were
2 primarily for family, personal or household purposes and which meets the definition
3 of a “debt” under 15 U.S.C. § 1692a(5).
4

5 11. The Debt was purchased, assigned or transferred to Defendants for
6 collection, or Defendants was employed by the Creditor to collect the Debt.
7

8 12. The Defendants attempted to collect the Debt and, as such, engaged in
9 “communications” as defined in 15 U.S.C. § 1692a(2).
10

B. The Facts

11 13. Within the last year, Defendants contacted Plaintiff in an attempt to
12 collect the Debt.
13

14 14. During the initial communication and during some communications
15 thereafter, Defendants failed to inform Plaintiff that the purpose of the calls was to
16 collect the Debt.
17

18 15. Defendants’ representative referred to himself as a “legal advisor,”
19 causing Plaintiff to believe she was speaking to an attorney.
20

21 16. Defendants failed to state their true identity during calls to Plaintiff and
22 would often times interchange their names when speaking to Plaintiff. Defendants also
23 manipulated the caller identification system and would call Plaintiff using different
24 company names. This caused Plaintiff to be confused and worried that several
25 different companies were attempting to collect the same Debt or various debts.
26
27

17. Defendants called Plaintiff on her cellular telephone at an excessive and harassing rate, causing her phone to ring daily, two to three times a day.

COUNT I
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692, et seq.

18. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

19. The Defendants engaged in behavior the natural consequence of which was to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt, in violation of 15 U.S.C. § 1692d.

20. The Defendants caused a phone to ring repeatedly and engaged the Plaintiff in telephone conversations, with the intent to annoy and harass, in violation of 15 U.S.C. § 1692d(5).

21. The Defendants placed calls to the Plaintiff without disclosing the identity of the debt collection agency, in violation of 15 U.S.C. § 1692d(6).

22. By hiding their true identity and causing confusion as to which entity was calling Plaintiff, Defendants used a deceptive means with which to collect a debt in violation of 15 U.S.C. § 1692e.

23. The Defendants failed to inform the consumer that the communication was an attempt to collect a debt, in violation of 15 U.S.C. § 1692e(11).

24. The Defendants used unfair and unconscionable means to collect a debt, in violation of 15 U.S.C. § 1692f.

25. The foregoing acts and omissions of the Defendants constitute numerous and multiple violations of the FDCPA, including every one of the above-cited provisions.

26. The Plaintiff is entitled to damages as a result of the Defendants' violations.

COUNT II

27. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

28. The Rosenthal Fair Debt Collection Practices Act, California Civil Code section 1788 *et seq.* (“Rosenthal Act”) prohibits unfair and deceptive acts and practices in the collection of consumer debts.

29. Defendants, in the regular course of business, engages in debt collection and is a “debt collector” as defined by Cal. Civ. Code § 1788.2(c).

30. The Defendants did not disclose the identity of the debt collection agency when communicating with the Plaintiff, in violation of Cal. Civ. Code § 1788.11(b).

1 31. The Defendants caused a telephone to ring repeatedly and engaged the
2 Plaintiff in continuous conversations with an intent to annoy the Plaintiff, in violation
3 of Cal. Civ. Code § 1788.11(d).
4

5 32. The Defendants communicated with the Plaintiff with such frequency as
6 to be considered harassment, in violation of Cal. Civ. Code § 1788.11(e).
7

8 33. The Defendants failed to comply with the provisions of 15 U.S.C. §
9 1692, et seq., in violation of Cal. Civ. Code § 1788.13(e).
10

11 34. The Defendants did not comply with the provisions of Title 15, Section
12 1692 of the United States Code, in violation of Cal. Civ. Code § 1788.17.
13

14 35. The Plaintiff is entitled to damages as a result of the Defendants'
15 violations.
16

COUNT III
VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT –
47 U.S.C. § 227, et seq.

17 36. The Plaintiff incorporates by reference all of the above paragraphs of this
18 Complaint as though fully stated herein.
19

20 37. At all times mentioned herein and within the last four years, Defendants
21 called Plaintiff on her cellular telephone using an automatic telephone dialing system
22 (“ATDS” or “Predictive Dialer”).
23

24 38. The TCPA prohibits the use of a Predictive Dialer, defined as “a dialing
25 system that automatically dials consumers’ telephone numbers in a manner that
26

1 “predicts” the time when a consumer will answer the phone and a [representative] will
2 be available to take the call...” *2003 TCPA Order*, 18 FCC 36 Rcd 14022. When a
3 representative is not “free to take a call that has been placed by a predictive dialer, the
4 consumer answers the phone only to hear ‘dead air’ or a dial tone, causing
5 frustration.” *Id.* In addition, the TCPA places prohibitions on companies that
6 “abandon” calls by setting “the predictive dialers to ring for a very short period of
7 time before disconnecting the call; in such cases, the predictive dialer does not record
8 the call as having been abandoned.” *Id.*

12 39. Defendants’ telephone systems have all the earmarks of a Predictive
13 Dialer. Often times when Defendants called Plaintiff, the phone would ring only two
14 times and then Defendants telephone system would abandon the call before Plaintiff
15 could answer the telephone.

17 40. When Plaintiff answered the phone, she experienced the “dead air” of the
18 Predictive dialer, and was required to say “hello” several times before Defendants’
19 phone system would connect her to the next available representative.

21 41. Defendants’ Predictive Dialers have the capacity to store or produce
22 telephone numbers to be called, using a random or sequential number generator.

24 42. Plaintiff never provided her cellular telephone to Defendants and never
25 provided her consent to be contacted on her cellular telephone.

43. The calls from Defendant to Plaintiff were not placed for “emergency purposes” as defined by 47 U.S.C. § 227(b)(1)(A)(i).

44. Each of the aforementioned calls made by Defendant constitutes a violation of the TCPA.

45. As a result of each of Defendant's negligent violations of the TCPA, Plaintiff is entitled to an award of \$500.00 in statutory damages for each call placed in violation of the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B).

46. As a result of each of Defendant's knowing and/or willful violations of the TCPA, Plaintiff is entitled to an award of treble damages in an amount up to \$1,500.00 for each and every violation of the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

COUNT IV
INVASION OF PRIVACY BY INTRUSION UPON SECLUSION

47. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

48. The Restatement of Torts, Second, § 652B defines intrusion upon seclusion as, “One who intentionally intrudes...upon the solitude or seclusion of another, or his private affairs or concerns, is subject to liability to the other for invasion of privacy, if the intrusion would be highly offensive to a reasonable person.”

49. California further recognizes the Plaintiff's right to be free from invasions of privacy, thus the Defendants violated California state law.

50. The Defendants intentionally intruded upon Plaintiff's right to privacy by continually harassing Plaintiff with the above referenced telephone calls.

51. The telephone calls made by the Defendants to Plaintiff were so persistent and repeated with such frequency as to be considered, "hounding the plaintiff," and, "a substantial burden to her existence," thus satisfying the Restatement of Torts, Second, § 652B requirement for an invasion of privacy.

52. The conduct of the Defendants in engaging in the illegal collection activities resulted in multiple invasions of privacy in such a way as would be considered highly offensive to a reasonable person.

53. As a result of the intrusions and invasions, the Plaintiff is entitled to actual damages in an amount to be determined at trial from the Defendants.

54. All acts of the Defendants and its agents were committed with malice, intent, wantonness, and recklessness, and as such, the Defendants are subject to punitive damages.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff prays that judgment be entered against the Defendants:

- 1 A. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1) against the
- 2 Defendants;
- 3
- 4 B. Statutory damages of \$1,000.00 pursuant to 15 U.S.C. §1692k(a)(2)(A)
- 5 against the Defendants;
- 6
- 7 C. Costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C.
- 8 § 1692k(a)(3) against the Defendants;
- 9
- 10 D. Actual damages pursuant to Cal. Civ. Code § 1788.30(a);
- 11
- 12 E. Statutory damages of \$1,000.00 for knowingly and willfully committing
- 13 violations pursuant to Cal. Civ. Code § 1788.30(b);
- 14
- 15 F. Statutory damages pursuant to 47 U.S.C. § 227(b)(3)(B) & (C);
- 16
- 17 G. Actual damages from the Defendants for the all damages including
- 18 emotional distress suffered as a result of the intentional, reckless, and/or
- 19 negligent FDCPA violations and intentional, reckless, and/or negligent
- 20 invasions of privacy and intentional infliction of emotional distress in an
- 21 amount to be determined at trial for the Plaintiff;
- 22
- 23 H. Punitive damages; and
- 24
- 25 I. Such other and further relief as may be just and proper.

TRIAL BY JURY DEMANDED ON ALL COUNTS

1 DATED: December 4, 2013

2 TAMMY HUSSIN

3 

4 By: _____

5 Tammy Hussin, Esq.

6 Lemberg & Associates, LLC

7 Attorney for Plaintiff, Sandra Huelsman

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge James V. Selna and the assigned Magistrate Judge is Douglas F. McCormick.

The case number on all documents filed with the Court should read as follows:

SACV13-1922-JVS (FFMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

December 10, 2013

Date

By MDAVIS

Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Sandra Huelsman		DEFENDANTS (Check box If you are representing yourself <input type="checkbox"/>) Worldwide Recoveries, LLC; Platinum Recovery, LLC; Premium Asset Services, LLC a/k/a PAS Services; Premium Receivables, LLC			
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.) Tammy Hussin, 6404 Merlin Drive, Carlsbad, CA 92011; (855) 301-2300 ext. 5514; of counsel to Lemberg & Associates, LLC, 1100 Summer Street, Third Floor, Stamford, CT 06905; (203) 653-2250		(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)			
II. BASIS OF JURISDICTION (Place an X in one box only.)		III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)			
<input checked="" type="checkbox"/> 1. U.S. Government Plaintiff	<input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party)	Citizen of This State <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in this State <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4		
<input type="checkbox"/> 2. U.S. Government Defendant	<input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5		
		Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input checked="" type="checkbox"/> 6		
IV. ORIGIN (Place an X in one box only.)		6. Multi-District Litigation <input type="checkbox"/>			
<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify)	
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		(Check "Yes" only if demanded in complaint.)			
CLASS ACTION under F.R.Cv.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> MONEY DEMANDED IN COMPLAINT: \$ 25,000			
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 15 USC 1692 - Violations of the Fair Debt Collection Practices Act					
VII. NATURE OF SUIT (Place an X in one box only).					
OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL PROPERTY	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	BANKRUPTCY	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> Conditions of Confinement	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	CIVIL RIGHTS	CIVIL RIGHTS	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 350 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	LABOR	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accomodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 790 Other Labor Litigation	
		<input type="checkbox"/> 448 Education		<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number:

SACV13-1922

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court?	STATE CASE WAS PENDING IN THE COUNTY OF	INITIAL DIVISION IN CACD IS
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Los Angeles	Western
If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action?	If the United States, or one of its agencies or employees, is a party, is it:	INITIAL DIVISION IN CACD IS	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims?	A Los Angeles County	B Ventura, Santa Barbara, or San Luis Obispo Counties	C Orange County	D Riverside or San Bernardino Counties	E Outside the Central District of California	F Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:	C.2. Is either of the following true? If so, check the one that applies:
<input type="checkbox"/> 2 or more answers in Column C	<input type="checkbox"/> 2 or more answers in Column D
<input type="checkbox"/> only 1 answer in Column C and no answers in Column D	<input type="checkbox"/> only 1 answer in Column D and no answers in Column C
Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. 	Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. 
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: 	Western

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? NO YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? NO YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- A. Arise from the same or closely related transactions, happenings, or events; or
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT): _____



DATE: December 4, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health Insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))